To: Stan Kaczmarek[StanK@demaximis.com]
Cc: Hoppe, Michael[Hoppe.Michael@epa.gov]; Budney, Sharon[BudneySL@cdmsmith.com]; Picunas, Amy[PicunasAE@cdmsmith.com]; Tsang, Frank[TsangC@cdmsmith.com]; Franklin, Elizabeth A NWK[Elizabeth.A.Franklin@usace.army.mil]
From: Vaughn, Stephanie
Sent: Thur 11/7/2013 9:56:00 PM
Subject: FW: RM 10.9, capping....

I meant add that we may have some additional comments on the Water Quality Monitoring Plan, and the accompanying memo.

Thanks

From: Vaughn, Stephanie
Sent: Thursday, November 07, 2013 4:52 PM
To: 'Stan Kaczmarek'
Cc: Hoppe, Michael; Budney, Sharon; Picunas, Amy; Tsang, Frank; 'Franklin, Elizabeth A NWK'
Subject: RM 10.9, capping....

Hi Stan,

We have a few additional comments/questions on the capping program.

1. The capping plan doesn't really address any contingency measures. For example, rain can adversely affect the carbon and freezing conditions can adversely affect the clay. How will these issues be dealt with, if needed?

2. Water Quality Monitoring Plan – we reviewed the 10/30/2013 memo outlining your proposed water quality monitoring plan during capping, and have the following comments:

•□□□□□□□ The analysis does not include any correlation studies to support the relationship between turbidity and COPCs in the water column. This analysis needs to be completed so we can understand the extent of the relationship, if any.

•□□□□□□□ While turbidity monitoring is still being proposed, the triggers have been removed. The same triggers that were used during dredging need to be used during capping operations, and work needs to be adjusted and/or stopped temporarily if unacceptable turbidity is found to have resulted from the operation. Previous experience shows that there is a higher likelihood of turbidity issues during capping operations than during dredging.

•□□□□□□□ While we agree that mobilization of COPCs is likely less of an issue during capping than during dredging, the potentially increased turbidity could still cause releases. As such, we recommend that limited COPC sampling be conducted during placement of the active cap layer. Our recommendation is that 1 COPC sample be analyzed per week from buoy locations 2 and 3. As during dredging, water should be collected along a transect at each location and composited into a single sample for each transect. Since placement of the active layer is expected to take 3 to 4 weeks, a total of 6 to 8 additional COPC samples will be needed. If a sufficiently fast turnaround time is used, and the results support it, this sampling may be able to be decreased.

Please let me know if you have any questions. I will not be working tomorrow, but will check my email in the morning. Feel free to call me on my cell if we need to discuss anything.

Thanks,

Stephanie